

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
FLORENCE DIVISION**

Liberty Property Holdings SC, LLC )  
individually, derivatively on behalf of )  
Renaissance Tower Horizontal Property )  
Regime, and on behalf of a class of all )  
other similarly situated; Azure Bleu, )  
LLC; Edelyne Beauvais-Thomas; Jason )  
E. Blosser; Nicole M. Blosser; Eshellah )  
D. Calhoun; Zachary G. Calhoun, David )  
DiMaio; Linda DiMaio; Susan H. )  
Ferguson; Four Parts Whole, LLC; )  
Sharon M. Hubbard; Carol A. )  
Messenger; Jeffrey S. Palmer; Summalin, )  
Inc.; Terry J. Tuminello; Shelley Ware; )  
and Jonathan S. Williams, )

Plaintiffs, )

v. )

Jeffrey L. Richardson; William S. Spears; )  
Brent M. Whitesell; Laurie Z. )  
Wunderley; Madeline R. Mercer; )  
Catherine M. Gregor; Dennis J. Sassa; )  
Tracy A. Meadows; Peter A. Grusauska; )  
and William Douglas Management, Inc., )

Defendants. )

**CASE NO. 4:22-CV-03556-RBH**

**NOTICE OF REQUEST FOR  
PROTECTION FROM COURT  
APPEARANCE**

YOU WILL PLEASE TAKE NOTICE that James K. Gilliam, Esquire, of Burr & Forman, LLP, attorney for Defendants, respectfully moves this Court for an Order of Protection from being called to trial or having any motions or other hearings scheduled before this Honorable Court for the period of June 14-16, 2023, for a planned family vacation.

Dated: May 12, 2023

BURR & FORMAN LLP

By /s/ James K. Gilliam

James K. Gilliam (Fed ID 10761)  
104 South Main St., Suite 700 (29601)  
Post Office Box 447  
Greenville, SC 29602  
864.271.4940 (Telephone)  
864.271.4015 (Facsimile)  
[jgilliam@burr.com](mailto:jgilliam@burr.com)  
ATTORNEY FOR DEFENDANTS